

Wood, Smith, Henning & Berman LLP  
TIMOTHY J. REPASS, OSB #126069  
12755 SW 69<sup>th</sup> Avenue, Suite 100  
Portland, Oregon 97223  
Telephone: 971-256-4010  
Facsimile: 971-275-1928  
[trepass@wshblaw.com](mailto:trepass@wshblaw.com)

Attorneys for Grand Cafe, Inc. dba Aladdin's  
Café, Diyana Kassab, and Mutasim Khan

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**FRANCISCO RAMIREZ, and KARLA  
CAAMAL**, individuals,

Plaintiffs,  
v.

Case No. 3:18-cv-1480

STIPULATION FOR ENTRY OF  
GENERAL JUDGMENT OF  
DISMISSAL

**GRAND CAFE, INC.**, an Oregon business  
corporation, doing business as **ALADDIN'S CAFE**,  
**DIYANA KASSAB**, individual, and **MUTASIM  
KHAN**, individual,

Defendants.

IT IS HEREBY AGREED AND STIPULATED by and between plaintiffs, Francisco  
Ramirez and Karla Caamal, and defendants, Grand Cafe, Inc. dba Aladdin's Café, Diyana  
Kassab, and Mutasim Khan, through their respective counsel, as follows:

1. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the  
parties jointly stipulate to dismiss this litigation with prejudice.
2. The parties further stipulate that each party shall bear their own costs of suit and  
fees, including any attorneys' fees.
3. Notwithstanding the dismissal of this action, the parties hereby stipulate and  
respectfully request that the United States District Court – District of Oregon, Portland Division,

retain jurisdiction to oversee compliance with the terms of the Settlement Agreement and to any motions to modify such terms. *See, Kokkonen v. Guardian Life Ins. Co. of America* (1994) 511 U.S. 375.

**IT IS SO STIPULATED:**

**WOOD, SMITH, HENNING &  
BERMAN, LLP**

**NORTHWEST WORKERS JUSTICE  
PROJECT**

By: /s/ Timothy J. Repass  
TIMOTHY J. REPASS, OSB #126069  
trepass@wshblaw.com  
Attorneys for defendants, Grande Café,  
Inc. dba Aladdin's Café, Diyana Kassab,  
and Mutasim Khan

By: /s/ Corinna Spencer-Scheurich  
CORINNA SPENCER-SCHEURICH,  
OSB #130147  
corinna@nwjp.org  
Attorneys for plaintiffs, Francisco  
Ramirez and Karla Caamal

Dated: 8/19/19

Dated: 8/19/19

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the undersigned is a citizen of the United States and a resident of the State of Washington, living in said state, over the age of eighteen (18) years, not a party to, and competent to be a witness in this action; that on this date the undersigned caused to be served on counsel of record as shown below, in the manner indicated, a true and correct copy of the foregoing document.

**Attorney for Plaintiffs:**

Corinna Spencer-Scheurich  
[corinna@nwjp.org](mailto:corinna@nwjp.org)  
Northwest Justice Workers' Justice Project  
812 SW Washington, Suite 1100  
Portland, OR 97205  
(X) E-Mail  
(X) CM/ECF Filing

**Attorney for Plaintiffs:**

D. Michael Dale  
[michaeldale@dmichaeldale.net](mailto:michaeldale@dmichaeldale.net)  
Law Office of D. Michael Dale  
PO Box 1032  
Cornelius OR 97113  
(X) E-Mail  
(X) CM/ECF Filing

**Defendant:**

Mutasim Khan  
16495 SW Marcile Lane  
Beaverton, OR 97007

(X) U.S. Mail

DATED this 1<sup>st</sup> day of August, 2019.



Michelle A. Davidson  
Legal Assistant  
[mdavidson@wshblaw.com](mailto:mdavidson@wshblaw.com)